

August 8, 2018

Federal Communications Commission
Washington, D.C.

Re: MB 18-184

Dear Members of the Commission:

I am writing on behalf of WLHC-FM and WLQC-FM in hearty support of the FM Class C4/73.215 petition.

As you well know, the long history of broadcasting regulation in our country from both a policy and legal standpoint is grounded on encouraging a diversity of voices and recognizing scarcity of spectrum. Competition, the touchstone of the business dimension of electronic communication, is what makes it all work. Adoption of the C4 proposal would enhance the competitive position of stations like ours and help resist the homogenization of programming that has inexorably followed consolidation.

Not surprisingly, the “big boys” of radio oppose the proposal. Technological economies of scale, however, have contributed little in the course of consolidation except to enable investors and management to line their pockets through highly leveraged financing and then in bankruptcy to leave creditors holding the bag. Regardless, given scarcity, big companies should not be allowed to park on unused spectrum. That restrains competition without any corresponding benefit and necessarily limits both the diversity of voices and their reach. Indeed, diversity without reach is no different from no diversity at all.

If, as the Chairman has said with respect to internet deregulation, the Commission’s priorities are access and competition, the C4 proposal is a solid step in that direction in the radio broadcasting arena. According to the Chairman, internet “regulations [have] squeeze[d] out the smaller companies that are necessary to provide a more competitive marketplace. . . . We need to incentivize the smaller companies to provide a competitive alternative” (NPR, Marketplace 2018). Likewise, in broadcasting.

We have a personal and direct interest in the communities we serve. Consequently, as I wrote in August 2014, we regularly hear from listeners pleading for better signal coverage, asking us to “boost our power.” Those requests have continued unabated. In fact, just two days ago, we received yet another such phone call.

As written in the mission statement of our stations, “We are dedicated to serving our community and its families and businesses, focusing on that which makes Life special” in our area. The public interest sits squarely at the center of all we do, and we have translated that interest into a format that includes substantial community and regional information, along with a unique mix of music and lifestyle features. To ensure our long-term viability, we would like – and need – to do more.

Faced with the stark day-to-day financial realities of small-market, independent radio operations like ours, I urge you to implement MB 18-184 without delay.

Sincerely,

Alan L. Button
President